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Attorneys for Defendant

GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**[PROPOSED] ORDER RE JOINT
LETTER BRIEF RE NOTICE ISSUES**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

Trial Date: February 10, 2025

1 Having considered the Joint Letter Brief Regarding Notice Issues, and having considered
2 Google's request to clarify the class definitions, or alternatively to permit Google to fully brief this
3 issue for the Court's benefit before approving a class notice program, the Court GRANTS
4 Google's request to clarify the class definitions as follows:

5 Class 1: All "non-Enterprise" and "non-Unicorn" individuals who, during the period beginning
6 July 1, 2016 and continuing through the present (the "Class Period"), (a) had their "Web & App
7 Activity" and/or "supplemental Web & App Activity" setting turned off and (b) whose activity on
8 a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device
running the Android operating system, because of the Firebase Software Development Kit
("SDK") and/or Google Mobile Ads SDK.

9 Class 2: All "non-Enterprise" and "non-Unicorn" individuals who, during the Class Period (a) had
10 their "Web & App Activity" and/or "supplemental Web & App Activity" setting turned off and
11 (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a
12 mobile device running a non-Android operating system, because of the Firebase SDK and/or
Google Mobile Ads SDK.

13 **IT IS SO ORDERED.**

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15 DATED: _____

16 Honorable Richard Seeborg
17 United States District Judge
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